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July 15, 1999

The Honorable William E. Kennard Chairman,
Commissioner Gloria Tristani,
Commissioner Michael Powell
Commissioner Susan Ness
Commissioner Harold Furchgott-Roth

Federal Communications Commission
The Portals
455 Twelfth Street S.W.
Washington, DC 20554

RE: LPFM Comment

Dear Ladies and Gentlemen,

I would like to express my support for the Commissions investigation of Low Power FM Broadcasting. This is an issue who's time has come. I strongly endorse its implementation.

As you are undoubtedly aware, it is no longer economically viable for most individuals, churches, universities, civic organizations or small businesses to obtain a commercial FM license. In most areas, it is not even possible for a qualified applicant to obtain a license for an educational frequency.

I must admit, I am continually puzzled by the proliferation of *new* FM translators which rebroadcast programming distributed by satellite. These seem to crop up in areas where there is "no room" for new broadcasters, yet there seems to be room for these. It's a very disturbing development. These satellite broadcasters are really "networks" which hardly seem to be in the spirit of the original intent of translator authorization. Most certainly these translators are a form of low power broadcasting, but it is questionable if most really contribute very much to a community they transmit in. I strongly feel that these frequencies would serve the public better in the hands of local broadcasters with local programming.

In any case, the trend toward consolidation in the broadcasting field by giants such as Jacor, CBS, Clear Channel and Chancellor (not to single out anyone in particular) has changed the texture of broadcasting. With the added burden of the Commissions new bidding process, it is no longer economically viable for an individual to apply for a start up construction permit. Responsible individuals or organizations who have the resources to finance the equipment and construction costs of a start up quickly come to the conclusion that the added expense of bidding

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for a frequency assignment makes local, and especially small market radio, a very unappealing financial proposition. While it is not the Commissions responsibility to insure that any broadcaster makes a profit, it should be your responsibility to insure that the airwaves are accessible to the public in some reasonable manner. Broadcasting should not be the exclusive territory of huge corporations who operate on leveraged debt and public offerings. The situation in the industry at the moment is similar to that of the U.S. banking business in the early 1980's, just before it collapsed. As I remember it, the government had to straighten things out (at great cost to the taxpayers) via the Resolution Trust Company. I don't expect the FCC to bail out broadcasting, but it is easy to conclude that the current direction the industry is headed is not a good one. With stations in my home town selling for up to \$66,000,000.00, (KLTY) it's a little hard to understand how anyone could even service the debt on such a purchase, much less have time or resources to be an asset to the community.

LPFM can help put the "local" back in radio. It's understandable that members of NAB and other established broadcasters are not very fond of the idea. After all, if someone with \$50,000.00 can compete with them, it makes them look pretty foolish for paying the \$66,000,000.00 for their facility. The fact of the matter is, in a major market where those kind of prices can be commanded, most LPFM stations would be in the 1-10 watt range. They would only cover a school or church campus area or a local neighborhood. A very few 100 watt stations might be assigned to these markets which could be capable of serving somewhat larger areas, but it is unlikely that they would impose any real threat to broadcasting giants. For the most part, the 1000 watt LPFM stations would be appropriate only in rural areas, where people are more scattered, but to an even greater degree than in a major city, need more diversity in broadcasting.

The small rural station owner who currently holds a license is probably the most threatened by LPFM, but he shouldn't be. If he is doing his job well, he should not suffer. Many years ago, I learned a simple key to success in business: "Do what your competition doesn't." It has served me well, but the principle works both ways. The established broadcaster may have to sharpen his skills a bit, but he simply needs to keep doing what he does best, and *not* what the LPFM broadcaster does. Besides, it's very unlikely that a new LPFM station in a previously one or two station town would choose to offer the same type of programming as the stations already in the area. Diversity is what it's all about. I think that LPFM and existing broadcasters can live well with each other and I'd go so far as to say that they can even earn each others mutual respect.

While I can think of literally hundreds of uses for this medium, I won't take any more of your time explaining my vision. I'm quite sure you already know what a useful tool this would be. I commend you for the thought and hope you will continue to support the idea of Low Power FM stations. I would like to be one of the first in line to apply for a license.

Sincerely,



Charles W. (Chuck) Conrad

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